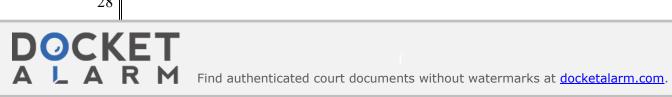
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15	NORTHERN DISTRICT OF CALIFORNIA	
16	SAN JO	OSE DIVISION
17	APPLIED MATERIALS, INC.,	Case No. 5:20-cv-09341-EJD
18	Plaintiff,	DECLADATION OF C. MACLAIN
19 20	VS.	DECLARATION OF C. MACLAIN WELLS IN SUPPORT OF DEMARAY
21	DEMARAY LLC,	LLC'S RESPONSIVE CLAIM CONSTRUCTION BRIEF
22	Defendant.	
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**DECLARATION OF C. MACLAIN WELLS** 

I, C. Maclain Wells, hereby declare as follows:

- 1. I am an attorney at the law firm of Folio Law Group PLLC, counsel for Defendant Demaray LLC ("Demaray"). I am a member in good standing of the State Bar of California and have been duly licensed to practice law before all of the courts of the State of California. I submit this declaration in support of Demaray's responsive claim constructive brief. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could testify to its contents.
  - 2. Attached as **Exhibit A** is a copy of U.S. Patent No. 7,381,657 ("the '657 Patent").
  - 3. Attached as **Exhibit B** is a copy of U.S. Patent No. 7,544,276 ("the '276 Patent").
- 4. Attached as **Exhibit C** is a copy of the August 17, 2021 Claim Construction Order entered in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634-ADA (W.D. Tex.), and in *Demaray LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 6:20-cv-00636-ADA (W.D. Tex.).
- 5. Attached as **Exhibit D** is a copy of the February 27, 2022 Claim Construction Order entered in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634-ADA (W.D. Tex.), and in *Demaray LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 6:20-cv-00636-ADA (W.D. Tex.).
- 6. Attached as **Exhibit E** is Intel and Samsung's Responsive Claim Construction Brief in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634-ADA (W.D. Tex.), Dkt. 58; and *Demaray LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 6:20-cv-00636-ADA (W.D. Tex.), Dkt. 62.
- 7. Attached as **Exhibit F** is a copy of U.S. Patent No. 6,350,353. The document is cited on the face of the '657 and '276 Patents.
- 8. Attached as **Exhibit G** is a copy of a white paper by Scholl, titled "Power supplies for pulsed plasma technologies: State-of-the-art and outlook." The document is cited on the face of the face of the '657 and '276 Patents, and was produced in the Western District of Texas cases, at DEFTS-PA\_002936.
- 9. Attached hereto as **Exhibit H** is a copy of Advanced Energy Industries, Inc.'s Pinnacle Plus+ 10 kW (325-650 Vdc) Master/Slave AE Bus, DeviceNet, MDXL User, UHF Output User



1	Manual (June 2002), which was filed in <i>Demaray LLC v. Intel Corp.</i> , Case No. 6:20-cv-00634-	
2	ADA (W.D. Tex.) at Docket 61-9.	
3	10. Attached as <b>Exhibit I</b> is an excerpt from the Modern Dictionary of Electronics (7th	
4	ed.), which Demaray produced in <i>Demaray LLC v. Intel Corp.</i> , Case No. 6:20-cv-00634-ADA	
5	(W.D. Tex.) at DEMINT00003506.	
6	11. Attached as <b>Exhibit J</b> is a copy of a white paper by Scholl, titled "Power Systems	
7	for Reactive Sputtering of Insulating Films." The document is cited on the face of the '657 and	
8	276 Patents, and was produced in the Western District of Texas cases at DEFTS-PA_003056.	
9	12. Attached as <b>Exhibit K</b> is the Declaration of Dr. Alexander D. Glew in Support of	
10	Demaray's Claim Construction brief, which has been served on Applied.	
11	13. I represented Demaray as its counsel in responding to all four of Applied's inter	
12	partes review petitions. As such, I am familiar with Applied's petitions and other filings in these	
13	matters. In IPR2021-00103, IPR2021-00104, IPR2021-00105, and IPR2021-00106, Applied did	
14	not seek construction of "narrow band rejection filter, "pulsed DC power" or "pulsed DC power	
15	supply, "a method of depositing an insulating film on a substrate, comprising," "the insulating	
16	film," or "insulating substrate."	
17		
18	Executed on April 1, 2022 in San Francisco, California. I declare under penalty of perjury	
19	that the foregoing is true and correct.	
20	By: /s/ C. Maclain Wells	
21	C. Maclain Wells	
22	Attorneys for Defendant DEMARAY LLC	
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